

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Preeti Kohli, )  
                  )  
Plaintiff,     )  
                  )  
vs.             )  
                  )  
Medical University of South Carolina,     )  
Ernest Benjamin Clyburn, MD, individually )  
And in his official capacity, and Ted A.    )  
Meyer, MD, individually and in his official )  
capacity,        )  
                  )  
Defendants.     )  
                  )

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**DEFENDANTS' RESPONSES TO  
LOCAL CIVIL RULE 26.01  
INTERROGATORIES**

Defendants, by and through their undersigned attorneys, hereby answer Local Civil Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** Defendants are unaware of any person or entity with a subrogation interest.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

**ANSWER:** Plaintiff requested a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER:** Defendants are not publicly owned companies.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER:** This action is a civil action over which this Court has original jurisdiction under 28 U.S.C. § 1331. Specifically, the Complaint alleges violations of various federal statutes.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER:** No.

- (F) [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER:** Defendants are properly identified.

- (G) [*Defendants only.*] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER:** None.

(H) Parties or Intervenors in a Diversity Case.

**ANSWER:** Not Applicable.

s/Bob J. Conley

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ATTORNEYS FOR DEFENDANT

Charleston, South Carolina

May 16, 2023